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 Attorneys for Plaintiffs

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

11 VICTOR PEREZ, as Special Administrator
 of the Estate of CARLOS PEREZ,
 12 deceased; VICTOR PEREZ, as the Guardian
 Ad Litem for S.E.P., a minor; VICTOR
 13 PEREZ, as the Guardian Ad Litem for A.I.P, a
 minor; and MYRA PEREZ, individually.

14 Plaintiff,

15 -vs-

16 STATE OF NEVADA; DIRECTOR GREG
 COX, individually; WARDEN DWIGHT
 17 NEVEN, individually; ASSISTANT
 WARDEN TIMOTHY FILSON, individually;
 18 COT. RAMOS, individually; LIEUTENANT
 OLIVER, individually; CORRECTIONS
 19 OFFICER CASTRO, individually;
 CORRECTIONS OFFICER
 20 SMITH, individually; and DOES I-X,
 21 inclusive; and ROES I-X, inclusive,

22 Defendants.

Case No.: 2:15-cv-1572-ADG-CWH

STIPULATION AND ORDER
TO EXTEND PLAINTIFFS'
REPLY TO NDOC DEFENDANTS'
MOTION TO DISMISS
AMENDED COMPLAINT [ECF 90] AND
EXTEND DEFENDANTS' REPLY TO
PLAINTIFFS' OPPOSITION TO NDOC
DEFENDANTS' MOTION TO DISMISS
AMENDED COMPLAINT
[First Request]

23 Plaintiffs, named above, by and through their counsel of record Cal J. Potter, III, Esq. and
 24 C. J. Potter, IV, Esq. of Potter Law Offices; Defendants, NDOC, James "Greg" Cox, Timothy
 25 Filson, Dwight Neven, and Ronald Oliver (hereinafter "NDOC Defendants") by and through their
 26 counsel of record Steve Shevorski and Theresa M. Haar, Deputy Attorney Generals, COT. Ramos,
 27 by and through his counsel of record, Robert W. Freeman, Jr. Esq. of Lewis Brisbois Bisgaard &
 28 Smith, LLP; Defendant, CO Castro, by and through his counsel of record,

Craig R. Anderson, Esq. of Marquis Aurbach Coffing; and Defendant CO Smith, by and through his counsel of record, Jeffrey R. Barr, Esq. of Ashcroft & Barr, LLP, and hereby submit this Stipulation to Extend Plaintiffs' Reply to NDOC Defendants' Motion to Dismiss Amended Complaint [ECF 90], filed December 28, 2016, currently due January 11, 2017, be extended an additional twenty-one (21) days up to and including Wednesday, February 1, 2017, and NDOC Defendants' Reply to Plaintiffs' Opposition to NDOC Defendants' Motion to Dismiss Amended Complaint be due on Wednesday, February 22, 2017.

Although Plaintiffs' counsel has been actively working on responding to Defendants' Motion, Plaintiffs' counsel has been unable to complete the Response. Since the filing of Defendants' Motion to Dismiss Plaintiffs' Amended Complaint, Plaintiffs' counsel has had a Supreme Court Brief and a Ninth Circuit Brief due, three (3) depositions, numerous substantive motions and responses; as well as other general appearances and deadlines. This request for extension is made in good faith and not for the purposes of delay.

WHEREFORE, the parties respectfully request that Plaintiffs' Response to Defendants' Motion to Dismiss Plaintiffs' Amended Complaint, be extended an additional twenty-one (21) days up to and including Wednesday, February 1, 2017, and NDOC Defendants' Reply to Plaintiffs' Opposition to NDOC Defendants' Motion to Dismiss Amended Complaint be due on Wednesday, February 22, 2017.

APPROVED AS TO FORM AND CONTENT.

DATED this 10th day of January, 2017.

POTTER LAW OFFICES

By /s/ C. J. Potter, IV, Esq.
 CAL J. POTTER, III, ESQ.
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 C. J. POTTER, IV, ESQ.
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 1125 Shadow Lane
 Las Vegas, Nevada 89102
Attorneys for Plaintiffs

SO ORDERED.


 UNITED STATES DISTRICT JUDGE
 Dated: January 10, 2017.

DATED this 10th day of January, 2017.

OFFICE OF THE NEVADA ATTORNEY GENERAL

By /s/ Theresa M. Haar, Esq.
 ADAM P. LAXALT, ATTORNEY GENERAL
 STEVE SHEVORISKI
 HEAD OF COMPLEX LITIGATION
 Nevada Bar No. 8256
 THERESA M. HAAR
 DEPUTY ATTORNEY GENERAL
 Nevada Bar No. 12158
 555 E. Washington Ave. Ste. 3900
 Las Vegas, Nevada 89101
Attorneys for NDOC Defendants

1 DATED this 10th day of January, 2017.

2 LEWIS BRISBOIS BISGAARD & SMITH

3 By /s/ Robert W. Freeman, Jr., Esq.
4 ROBERT W. FREEMAN, JR., ESQ.
5 Nevada Bar No. 3062
6 6385 S. Rainbow Blvd., Suite 600
7 Las Vegas, Nevada 89118
8 *Attorney for Defendant*
9 *Correction Officer Trainee*
10 *Raynaldo-John Ramos*

11 DATED this 10th day of January, 2017.

12 ASHCRAFT & BARR, LLP

13 By /s/ Jeffrey F. Barr, Esq.
14 JEFFREY F. BARR, ESQ.
15 Nevada Bar No. 7269
16 LEE I. IGOLDY, ESQ.
17 Nevada Bar No. 7757
18 2300 West Sahara Avenue, Suite 1130
19 Las Vegas, Nevada 89102
20 *Attorneys for Defendant Isaiah Smith*

DATED this 10th day of January, 2017.

MARQUIS AURBACH COFFING

By /s/ Craig R. Anderson, Esq.
CRAIG R. ANDERSON, ESQ.
Nevada Bar No. 6882
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorney for Defendant Castro

ORDER

IT IS SO ORDERED.

DATED

UNITED STATES DISTRICT COURT JUDGE